

ORIGINAL

1 dominicborjaetalinf

2 LEONARDO M. RAPADAS
United States Attorney
3 KRISTIN D. ST. PETER
Special Assistant U.S. Attorney
4 Sirena Plaza, Suite 500
108 Hernan Cortez Avenue
5 Hagåtña, Guam 96910
PHONE: (671) 472-7332
6 FAX: (671) 472-7334

7 Attorneys for the United States of America

FILED

DISTRICT COURT OF GUAM

JAN - 9 2007

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT

FOR THE TERRITORY OF GUAM

11 UNITED STATES OF AMERICA,) MAGISTRATE CASE NO. 07-00001
12 Plaintiff,)
13)
14)
15 DOMINIC C. BORJA,)
MARIANO C. SALAS, and)
ENRIQUE REYES TEDTAOTAO,)
16 Defendants.)
17 _____
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)
THE UNITED STATES ATTORNEY CHARGES:

COUNT I - CONSPIRACY

On or about November 19, 2006, in the District of Guam, the defendants, DOMINIC C. BORJA, MARIANO C. SALAS, and ENRIQUE REYES TEDTAOTAO did conspire together to go upon a United States military reservation, to wit, Andersen Air Force Base to unlawfully take a wild animal, in violation of 5 Guam Code Annotated, Section 63121 and 16 USC § 3372, as assimilated by Title 18, United States Code, Sections 7(3) and 13, in violation of 18 U.S.C. 371.

1

1 **COUNT II - UNLAWFUL TAKING OF WILD ANIMAL**

2 On or about November 19, 2006, in the District of Guam, the defendants, DOMINIC C.
3 BORJA, MARIANO C. SALAS, and ENRIQUE REYES TEDTAOTAO did go upon a United
4 States military reservation, to wit, Andersen Air Force Base and did unlawfully take a wild
5 animal, in violation of 5 Guam Code Annotated, Section 63121 and 16 USC § 3372, as
6 assimilated by Title 18, United States Code, Sections 7(3) and 13.

7 **COUNT III- ENTERING MILITARY, NAVAL, OR COAST GUARD PROPERTY**

8 On or about November 19, 2006, in the District of Guam, the defendants, DOMINIC C.
9 BORJA, MARIANO C. SALAS, and ENRIQUE REYES TEDTAOTAO did go upon a United
10 States military reservation, to wit, Andersen Air Force Base, for a purpose prohibited by law,
11 that is, intending to engage in conduct in violation of 5 Guam Code Annotated, Section 63121
12 and 16 USC § 3372, as assimilated by Title 18, United States Code, Sections 7(3) and 13, in
13 violation of 18 U.S.C. 1382.

14 DATED this 9th day of January, 2007.

15 LEONARDO M. RAPADAS
16 United States Attorney
17 Districts of Guam and NMI

18 By:

19 
20 KRISTIN D. ST. PETER
21 Special Assistant U.S. Attorney